

STEVENSON MARINOLLP

Justin Marino, Partner o: (212) 939-7228 f: (212) 531-6129
a: 2000 Deer Park Avenue, Deer Park, NY 11729
e: jmarino@stevensonmarino.com

January 2, 2025

VIA ECF

Hon. Philip M. Halpern
United State District Court, Southern District of New York
300 Quarropas Street, Room 530
While Plains, New York 10601

Re: *Chang v. Shen Yun Performing Arts, Inc., et. al.*
Civ. Action. No. 24-cv-08980 (PMH)

Dear Judge Halpern:

This office represents Shujia Gong a/k/a Tianliang Zhang (the “Defendant”), in the above-referenced matter. We write to request an extension of Defendant’s time to answer, move, or otherwise respond to the Complaint from January 10, 2025, to and including February 19, 2025.

Due to the complexity of the claims asserted, the fact that translation is required for various individuals that have knowledge concerning this matter, and that we were recently retained by Defendant, additional time is needed to evaluate the claims and prepare an appropriate response.

This is the first request for the relief herein. Plaintiff’s counsel does not oppose this request.

Very truly yours,

/s/ **Justin R. Marino**

Justin R. Marino

cc: Plaintiff’s Counsel of Record (Via ECF)